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April 5, 2023

The Honorable Michael B. Kaplan  
United States Bankruptcy Court, District of New Jersey  
Clarkson S. Fisher US Courthouse  
402 East State Street, Courtroom #8  
Trenton, NJ 08608

Re: LTL Mgmt. LLC, Adv. Proc. No. 23-01092 (MBK)

Dear Chief Judge Kaplan:

I write regarding the *Ex Parte Temporary Restraining Order* [Dkt. 9] (the “TRO”), which the Court entered today in the above-referenced adversary proceeding. Paragraph 7 of the form of TRO submitted to the Court excepts from the stay 12 appeals with respect to which surety bonds are stated to have been issued. Upon further review, the Debtor has determined that surety bonds are not in fact currently issued with respect to six of the referenced appeals, and one other such appeal has been resolved.

The Debtor therefore requests that the Court enter the proposed amended form of TRO enclosed herewith as Annex I, which eliminates from paragraph 7 the seven appeals that were inadvertently included previously. A redline to the TRO, as entered by the Court, is enclosed herewith as Annex II.

Respectfully submitted,

/s/ Daniel J. Merrett

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